

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

FEE STATEMENT COVER SHEET

Debtor: LTL Management LLC Applicant: Parkins & Rubio LLP
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel
Chapter: 11 Case Filed: April 4, 2023

**SECTION I
FEE SUMMARY**

Monthly Fee Statement Covering the Period
April 18, 2023 through April 30, 2023

Total Fees:	\$126,660.00
Total Disbursements:	\$ 0
Minus % holdback of Fees:	\$ 25,332.00
Amount Sought at this Time	\$101,328.00

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
1. Lenard Parkins, Partner	1976	54.80	\$1,150.00	\$63,020.00
2. Charles Rubio, Partner	2008	75.20	\$775.00	\$58,280.00
3. Gloria Jackson, Paralegal	N/A	11.4	\$200.00	\$2,280.00
4. Jennifer Cook, Paralegal	N/A	15.4	\$200.00	\$3,080.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	\$0
b) Asset Disposition Sales, leases (section 365 matters), abandonment and related transaction work related to asset disposition.	0	\$0
c) Assumption and Rejection of Leases and Contracts Analysis of leases and executory contracts and preparation of motions specifically to assume or reject.	0	\$0
d) Avoidance Action Analysis Review of potential avoiding actions under Sections 544–549 of the Code to determine whether adversary proceedings are warranted.	0	\$0
e) Budgeting (Case) Preparation, negotiation, and amendment to budgets for applicant.	0	\$0
f) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	\$0
g) Case Administration Coordination and compliance activities not specifically covered by another category.	20.4	\$16,547.50
h) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowances of claims.	0	\$0
i) Corporate Governance and Board Matters Preparation for and attendance at Board of Directors meetings; analysis and advice regarding corporate governance issues, including trustee, examiner, and CRO issues; review and preparation of corporate documents (e.g., articles and bylaws, etc.).	0	\$0
j) Employee Benefits and Pensions Review and preparation related to employee and retiree benefit issues, including compensation, bonuses, severance, insurance benefits, and 401K, pensions, or other retirement plans.	0	\$0
k) Employment and Fee Applications Preparation of employment and fee applications for self or others; motions to establish interim procedures.	0	\$0

l) Employment and Fee Application Objections Review of and objections to the employment and fee applications of others.	0	\$0
m) Litigation Contested Matters and Adversary Proceedings (not otherwise within a specific project category), each identified separately by caption and adversary number, or title of motion or application and docket number, and using the Uniform Task Based Management System (“UTBMS”) Litigation Task Code Set.	14.4	\$13,860.00
n) Meetings and Communications with Creditors Preparation for and attendance at section 341(a) meeting and any other meetings with creditors and creditors’ committees.	1.2	\$1,155.00
o) Non-Working Travel Non-working travel where the court reimburses at less than full hourly rates.	0	\$0
p) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to the allowance and objections to allowance of claims.	120.8	\$95,097.50
q) Real Estate Review and analysis of real estate-related matters, including purchase agreements and lease provisions (e.g., common area maintenance clauses).	0	\$0
r) Relief from Stay and Adequate Protection Matters relating to termination or continuation of automatic stay under 11 U.S.C. 362 and motions for adequate protection under 11 U.S.C. 361.	0	\$0
s) Reporting Statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities; contacts with the United States Trustee not included in other categories.	0	\$0
t) Tax Analysis of tax issues and preparation of federal and state tax returns.	0	\$0
u) Valuation Appraise or review appraisals of assets.	0	\$0
SERVICE TOTALS:	156.80	\$126,660.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Copies	\$0
b) Outside Printing	\$0
c) Telephone	\$0
d) Facsimile	\$0
e) Online Research	\$0
f) Delivery Services/Couriers	\$0
g) Postage	\$0
h) Local Travel	\$0
i) Out-of-town Travel	\$0
j) Out-of-town Travel: Transportation	\$0
k) Out-of-town Travel: Hotel	\$0
l) Out-of-town Travel: Meals	\$0
m) Out-of-town Travel: Ground Transportation	\$0
n) Out-of-town Travel: Other	\$0
o) Meals (local)	\$0
p) Court Fees	\$0
q) Subpoena Fees	\$0
r) Witness Fees	\$0
s) Deposition Transcripts	\$0
t) Trial Transcripts	\$0
u) Trial Exhibits	\$0
v) Litigation Support Vendors	\$0
w) Experts	\$0
x) Investigators	\$0
y) Arbitrators/Mediators	\$0
z) Other	\$0
DISBURSEMENTS TOTAL:	\$0

I certify under penalty of perjury that the above is true.

Date: July 11, 2023

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

PARKINS & RUBIO LLP

Lenard M. Parkins, Esq.
Charles M. Rubio, Esq.
lparkins@parkinsrubio.com
crubio@parkinsrubio.com
Pennzoil Place
700 Milam St., Suite 1300
Houston, TX 77002
Tel: (713) 715-1666

Ad Hoc Committee of Supporting Counsel

In re:

LTL Management LLC,
Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PARKINS & RUBIO LLP,
AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE PERIOD
APRIL 18, 2023 THROUGH APRIL 30, 2023**

Parkins & Rubio LLP (“P&R”) submits this Monthly Fee Statement (the “Statement”) for services rendered and expenses incurred as Ad Hoc Committee of Supporting Counsel¹ for the period commencing April 18, 2023 and ending April 30, 2023 (the “Statement Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals* [Docket No. 562] (as modified, the “Interim Fee Procedures Order”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements

¹ On June 20, 2023, the Bankruptcy Court entered the *Order Authorizing the Debtor to Enter into an Expense Reimbursement Agreement with Ad Hoc Committee of Supporting Counsel* [Docket. 838] that provides for the period of April 18, 2023, through the termination of the Reimbursement Agreement (together, the “Fees and Expenses”).

necessarily incurred by P&R for the Statement Period are annexed hereto. These invoices detail the services performed by PR.

The fees payment and the expense reimbursement requested in this Statement is as follows:

Fees (100%)	Fee Holdback (20%)	Fee Payment (80%)	Expense Reimbursement (100%)
\$126,660.00	\$25,332.00	\$101,328.00	\$0

WHEREFORE, P&R respectfully requests payment of fees for the Statement Period of \$101,328.00 (80% of total fees and 100% of expenses) in accordance with the Interim Fee Procedures Order.

Dated: July 11, 2023

/s/ Charles M. Rubio
PARKINS & RUBIO LLP
Ad Hoc Committee of Supporting Counsel

Summary of Invoices



Parkins & Rubio LLP
 700 Milam Street, Suite 1300
 Houston, Texas 77002
 United States
www.parkinsrubio.com

LTL (AD HOC COMMITTEE OF SUPPORTING COUNSEL)

Invoice	Project Category	Invoice Amount
Invoice #888	Case Administration	\$16,547.50
Invoice #889	Litigation	\$13,860.00
Invoice #890	Meetings and Communications with Creditors	\$1,155.00
Invoice #891	Plan and Disclosure Statement	\$95,097.50

Fees	\$126,660.00
Less 20%	\$25,332.00
Fee Payment Requested	\$101,328.00
Expense Reimbursement(100%)	\$0
Fee Payment Requested Plus Expense Reimbursement	\$101,328.00

Payment Instructions

Check Payment Information

Remit checks to: Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002

Wire Transfer and Online Payment Information

Bank Name/Address: JPMorgan Chase Bank, N.A.
dba Chase Bank
8 East Pkwy, Scarsdale, NY 10583

Bank ABA/Routing #: ABA Number 021000021 (For international transfers: CHASUS33)

Name/Account #: Parkins & Rubio LLP
Operating Account
Account Number 761958377



INVOICE

P&R Internal Reference # 888
Date: 06/19/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Case Administration

Date	Attorney	Description	Quantity	Rate	Total
04/19/2023	CMR	Call with M. Nachawati regarding the retention of Parkins & Rubio LLP as counsel for the ad hoc committee (.4); review recent pleadings filed in the LTL case including notice procedures order, order allowing Debtor to file list of largest law firms, etc (1.2); prepare proposed engagement letter and send to L. Parkins for comments (.8); prepare notice of appearance and review examples and related pleadings including pro hac vice motions filed by others (.8).	3.20	\$775.00	\$2,480.00
04/19/2023	LMP	Call with M. Nachawati regarding the retention of Parkins & Rubio LLP as counsel for the ad hoc committee (.4); review recent LTL case notice procedures order (.4); review order allowing Debtor to file list of largest law firms, etc (.6); work on revisions to ad hoc committee engagement letter (.5); review draft notice of appearance and pro hac vice motions filed by other firms (.5).	2.40	\$1,150.00	\$2,760.00
04/20/2023	CMR	Review and make comments to ad hoc committee statement and circulate to group (.8); work on press release with L. Parkins and circulate to group (1.0); with L. Parkins, K. Hansen, S. Van Aalten, M. Murphy to discuss LTL case and initial ad hoc committee matters (1.0); meeting with ad hoc committee and its counsel to discuss plan voting mechanics and organizational matters (.8); begin working on ad hoc committee bylaws (.8); begin reviewing Boy	5.20	\$775.00	\$4,030.00

Scouts case for issues dealing with voting mechanics (.8).					
04/20/2023	LMP	Work on press release with C. Rubio (1.0); work with C. Rubio, K. Hansen, S. Van Aalten, M. Murphy to discuss LTL case and initial ad hoc committee matters (1.0).	2.00	\$1,150.00	\$2,300.00
04/21/2023	CMR	Work on Committee Bylaws (2.2); call with M. Nachawati regarding plan terms (1.1); calls with L. Parkins regarding bylaws and plan voting mechanics (.4).	3.70	\$775.00	\$2,867.50
04/21/2023	LMP	Call with C. Rubio regarding bylaws and plan voting mechanics (.4).	0.40	\$1,150.00	\$460.00
04/24/2023	GJ	Open matters and assign categories on the same (1.4), print LTL/TCC Motion to Dismiss and prepare 3 binders and forward the same to L. Parkins to review (.9); docket response to Motion for Request for Certification of Direct Appeal to Circuit Court (.1) .	2.40	\$200.00	\$480.00
04/25/2023	GJ	Review and docket upcoming hearings and deadlines responses on firm calendar.	0.10	\$200.00	\$20.00
04/27/2023	LMP	Review current filings in LTL-2 Case (1.0).	1.00	\$1,150.00	\$1,150.00
Quantity Subtotal					20.4

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	5.8	\$1,150.00	\$6,670.00
Charles Rubio	12.1	\$775.00	\$9,377.50
Gloria Jackson	2.5	\$200.00	\$500.00
Quantity Total			20.4
Subtotal			\$16,547.50
Total			\$16,547.50

Minus 20% Holdback Fees in the amount of \$3,309.50.



INVOICE

P&R Internal Reference # 889
Date: 06/19/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Litigation

Date	Attorney	Description	Quantity	Rate	Total
04/18/2023	LMP	Attend PI hearing by zoom (5.8).	5.80	\$1,150.00	\$6,670.00
04/18/2023	CMR	Attend PI hearing by zoom.	5.80	\$775.00	\$4,495.00
04/20/2023	LMP	Attend PI hearing by zoom for ruling on PI (1.4).	1.40	\$1,150.00	\$1,610.00
04/20/2023	CMR	Attend ruling on preliminary injunction.	1.40	\$775.00	\$1,085.00

Quantity Subtotal 14.4

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	7.2	\$1,150.00	\$8,280.00
Charles Rubio	7.2	\$775.00	\$5,580.00

Quantity Total 14.4

Subtotal \$13,860.00

Total \$13,860.00

Minus 20% Holdback Fee in the Amount of \$2,772.00



INVOICE

P&R Internal Reference # 890
Date: 06/19/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Meetings and Communications with Creditors

Date	Attorney	Description	Quantity	Rate	Total
04/21/2023	CMR	Call with Committee members and Committee counsel.	0.60	\$775.00	\$465.00
04/21/2023	LMP	Call with Committee members and Committee counsel.	0.60	\$1,150.00	\$690.00
Quantity Subtotal					1.2

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	0.6	\$1,150.00	\$690.00
Charles Rubio	0.6	\$775.00	\$465.00
Quantity Total			1.2
Subtotal			\$1,155.00
Total			\$1,155.00

Minus 20% Holdback Fee in the Amount of \$231.00.



INVOICE

P&R Internal Reference # 891
Date: 06/28/2023

Parkins & Rubio LLP
700 Milam Street, Suite 1300
Houston, Texas 77002
www.parkinsrubio.com

LTL (Ad Hoc Committee)

Project Category: Plan and Disclosure Statement

Date	Attorney	Description	Quantity	Rate	Total
04/23/2023	CMR	Research plan voting mechanics in Boy Scouts with L. Parkins (2.8).	2.80	\$775.00	\$2,170.00
04/23/2023	LMP	Review Boy Scouts Disclosure Statement Order approving voting rights by individual victims by digital methodology for purposes of preparation of voting protocols in LTL-2 (2.8).	2.80	\$1,150.00	\$3,220.00
04/24/2023	CMR	Prepare email memo to co-counsel regarding findings of research on plan voting mechanics in Boy Scouts (.8); discuss same with L. Parkins (.3); work on Trust Distribution Procedures with L. Parkins (8.9).	10.00	\$775.00	\$7,750.00
04/24/2023	JC	Convert and edit document of plan and disclosure statement issues and forward same to L. Parkins and C. Rubio for review.	0.30	\$200.00	\$60.00
04/24/2023	CMR	Work on Trust Distribution Procedures with L. Parkins.	8.90	\$775.00	\$6,897.50
04/24/2023	LMP	Work on Trust Distribution Procedures (TDP) and extended meeting with C. Rubio to discuss and make substantial revisions thereto (8.9).	8.90	\$1,150.00	\$10,235.00
04/24/2023	LMP	Complete research in Boy Scout case on broad support by ad hoc victims committee for victims for individual voting rights by digital method (1.9) and discuss same with C.	11.40	\$1,150.00	\$13,110.00

		Rubio (.3); and communicate findings to M. Watts (.3); work on Trust Distribution Procedures (TDP) and extended meeting with C. Rubio to discuss and make substantial revisions thereto (8.9).			
04/24/2023	GJ	Type points identified for discussion on Plan and Grid Development and forward the same to C. Rubio and L. Parkins to review.	0.20	\$200.00	\$40.00
04/25/2023	CMR	Continue to work on draft of the Trust Distribution Procedures and send draft to J. Onder and M. Nachawati for comments (5.4); continue to review and revise Trust Distribution Procedures (3.5).	8.90	\$775.00	\$6,897.50
04/25/2023	LMP	Revisions to current draft of TDP (2.2); review Imerys TDP (1.4); review Plan Term Sheet for treatment of Tal Claims under plan for inclusion in TPD, and revise TDP to conform to Term Sheet (1.1); 2 calls with M. Nachawati regarding TDP issues (1.2).	5.90	\$1,150.00	\$6,785.00
04/26/2023	JC	Review and edit trust distribution document.	2.40	\$200.00	\$480.00
04/26/2023	CMR	Work with L. Parkins in connection with the TDP (1.2); call with L. Parkins and M. Watts to discuss electronic voting (.2); further revise the the TDP and circulate to M. Nachawati and J. Onder (11.5).	12.90	\$775.00	\$9,997.50
04/26/2023	LMP	Work on revisions to TDP (1.6); call with C. Rubio regarding same (.4); call with M. Watts regarding plan voting by digital method (.2); review new/updated version of TDP that was sent to J. Onder and M. Nachawati (1.7).	3.90	\$1,150.00	\$4,485.00
04/27/2023	JC	Review Trust Distribution document and edit same, including adding table of contents and otherwise revising the formatting of the document to make it redline ready.	7.80	\$200.00	\$1,560.00
04/27/2023	GJ	Continue reviewing and editing TDP document with J. Cooks including revising the formatting to make the document readline ready for later versions and send to C. Rubio and L. Parkins for review.	4.10	\$200.00	\$820.00
04/28/2023	GJ	Continue reviewing and editing TDP document with J. Cooks revising the formatting of the document to make it redline ready.	4.60	\$200.00	\$920.00
04/28/2023	JC	Continue reviewing and editing trust distribution procedures document revising the formatting to make it redline ready, and forward the same to C. Rubio and L. Parkins for review.	4.90	\$200.00	\$980.00

04/28/2023	LMP	Review and make revisions to current draft of TDP (1.1); call with C. Rubio regarding same (.5); call with J. Onder and M. Nachawati regarding same and comments on matrix (1.3).	2.90	\$1,150.00	\$3,335.00
04/28/2023	LMP	Respond to question from M. Nachawati regarding fraudulent conveyance claw- back risk if JJ makes payment to settle certain constituency issues (.4).	0.40	\$1,150.00	\$460.00
04/28/2023	CMR	Continue to work on Trust Distribution Procedures and send revised draft to J. Onder and M. Nachawati (4.5) call with L. Parkins regarding same (.5).	5.00	\$775.00	\$3,875.00
04/29/2023	LMP	Review and comment on updated draft of TPD that J. Onder and M. Nachawati are working on after reviewing Quigley TDP (1.7).	1.70	\$1,150.00	\$1,955.00
04/29/2023	CMR	Continue to review and revise the draft of the TDP and correspondence with J. Onder and M. Nachawati regarding same.	3.50	\$775.00	\$2,712.50
04/30/2023	LMP	Review current draft of TDP (.8); participate in extended call with J. Onder and C. Rubio regarding same and make substantial revisions thereto and circulate the same to co-counsel (2.5).	3.30	\$1,150.00	\$3,795.00
04/30/2023	CMR	Prepare for call with J. Onder and L. Parkins to review Trust Distribution Procedures (.8); call with J. Onder and L. Parkins to revise draft Trust Distribution Procedures and circulate draft to co-counsel (2.5).	3.30	\$775.00	\$2,557.50

Quantity Subtotal 120.8

Time Keeper	Quantity	Rate	Total
Lenard M Parkins	41.2	\$1,150.00	\$47,380.00
Charles Rubio	55.3	\$775.00	\$42,857.50
Jennifer Cook	15.4	\$200.00	\$3,080.00
Gloria Jackson	8.9	\$200.00	\$1,780.00

Quantity Total 120.8

Subtotal \$95,097.50

Total \$95,097.50

Minus 20% Holdback fee in the amount of \$19,019.50